

II. REMARKS

1. Claims 1-18 remain in the application.
2. Applicants appreciate the indication that claims 2-8 and 12-17 would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. However, Applicants believe that these claims are patentable as they stand for the reasons stated below.
3. Applicants respectfully submit that claims 1, 9-11, and 18 are not anticipated by Reedy et al. (US 6,583,445, "Reedy") under 35 USC 102(b).

Reedy fails to disclose or suggest a laser driver, fails to disclose or suggest respective separate compartments for said laser source and said laser driver, and further fails to disclose or suggest that the laser source and the laser driver are arranged in said separate compartments whereby said laser source is exempt from being directly irradiated by said laser driver, all as recited by claims 1 and 18.

3.1 Reedy fails to disclose or suggest a laser driver. The Office Action equates item 34 of Figure 3A of Reedy with the laser driver of the present invention. Applicants submit that item 34 of Reedy is clearly a lens.

Column 18, lines 4-9 of Reedy state:

The system 29 includes an 8x8 transmitter array 30 of substrate emitting (i.e., bottom-emitting) InGaAs-quantum-well VCSELs 31 as transmitters, an 8x8 receiver array 32 of backside illuminated

InGaAs/InP photodetectors 33 as receivers, and a compound lens 34 to optically couple them.
(Emphasis added)

Column 18, lines 16-29 of Reedy state:

The VCSEL 31 and photodetector 33 arrays 30,32 are positioned relative to the compound lens 34 such that one-to-one magnification is achieved from the VCSEL array 30 to the image projected onto the detector array 32. The lens 34 (made by Universe Kogaku Inc.) has the following characteristics: 13.0-mm focal length, 6.76-mm back focal length, 5.36.times.4.01-mm format size, and fl 1.12.
(Emphasis added)

Applicants have attached a definition of laser driver from http://www.maxim-ic.com/glossary/index.cfm/Ac/V/ID/192/Tm/LASER_DRIVER/ln/en, the web site of Dallas Semiconductor, a manufacturer of laser products. A laser driver is generally a device that supplies current to a laser diode.

Applicants recognize that during patent examination, the pending claims must be given their broadest reasonable interpretation, but that interpretation must be consistent with the specification. See MPEP 2111 quoting *In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000).

Equally important, the broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach. MPEP 2111 quoting *In re Cortright*, 165 F.3d 1353, 1359, 49 USPQ2d 1464, 1468 (Fed. Cir. 1999).

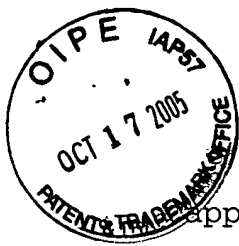
Applicants submit that no one skilled in the art would equate the laser driver of the present claims with the lens of Reedy.

3.2 Reedy fails to disclose or suggest respective separate compartments for the laser source and the laser driver. Figures 2A-2C and column 15, lines 55-65 cited by the Examiner, describe a top emitting vertical cavity surface emitting laser 20 and a MOS transistor 21 forming an integrated module 10. There is nothing related to separate compartments for the laser source and its driver. In fact, the laser 20 and transistor 21 are coupled together by solder bump 18. Figures column 16, lines 1-65, also cited by the Examiner describe various configurations of vertical cavity surface emitting laser 20. Figures 3A-3E show various arrays of vertical cavity surface emitting lasers and photodetectors. There is nothing in these sections or in any other section of Reedy related to separate compartments for a laser source and a laser driver.

3.3 Reedy fails to disclose or suggest that the laser source and the laser driver are arranged in the separate compartments whereby the laser source is exempt from being directly irradiated by the laser driver. There is simply no disclosure in Reedy related to any arrangement that prevents the laser source from being irradiated by the laser driver.

At least for these reasons, Applicants respectfully submit that Reedy fails to anticipate independent claims 1 and 18, and dependent claims 2-17.

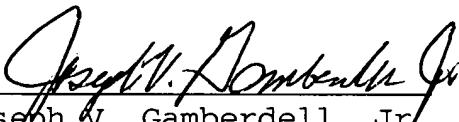
For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the



application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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13 October 2005
Date

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